

LOWENSTEIN SANDLER LLP  
Kenneth A. Rosen, Esq.  
Jeffrey D. Prol, Esq.  
One Lowenstein Drive  
Roseland, NJ 07068  
Telephone: (973) 597-2500  
Facsimile: (973) 597-2400  
krosen@lowenstein.com  
jprol@lowenstein.com  
*Counsel to the Debtors and  
Debtors in Possession*

CAPLIN & DRYSDALE,  
CHARTERED  
James P. Wehner, Esq.  
(admitted *pro hac vice*)  
Jeffrey A. Liesemer, Esq.  
(admitted *pro hac vice*)  
One Thomas Circle, N.W.  
Washington, DC 20005  
Telephone: (202) 862-5000  
Facsimile: (202) 429-3301  
jwehner@capdale.com  
jliesemer@capdale.com  
*Counsel to the Asbestos  
Claimants Committee*

YOUNG CONAWAY  
STARGATT & TAYLOR, LLP  
Edwin J. Harron, Esq.  
Sara Beth A. R. Kohut, Esq.  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801  
Telephone: (302) 571-6703  
Facsimile: (302) 576-3298  
eharron@ycst.com  
skohut@ycst.com  
*Counsel to the Legal  
Representative*

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

---

|   |   |                       |
|---|---|-----------------------|
| In re:                                    | : | Case No. 18-27963-MBK |
| DURO DYNE NATIONAL CORP., <i>et al.</i> , | : | Chapter 11            |
| Debtors. <sup>1</sup>                     | : | Jointly Administered  |
|   | : |                       |

---

**NOTICE OF JOINT MOTION TO EXEMPT ASBESTOS CLAIMS  
AND DEMANDS FROM THE JANUARY 8, 2019 CLAIMS BAR DATE**

**PLEASE TAKE NOTICE** that on **December 10, 2018 at 11:00 a.m. (ET)**, or as soon thereafter as counsel may be heard, the above-captioned debtors and debtors-in-possession, the Official Committee of Asbestos Claimants, and Lawrence Fitzpatrick in his official capacity as Legal Representative (collectively, “Movants”), by and through their undersigned counsel, shall move (the “Motion”) before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, in Courtroom #8 of the United States Bankruptcy Court for the District of New Jersey, 402 E. State

---

<sup>1</sup> The “**Debtors**” in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number, are Duro Dyne National Corp. (4664), Duro Dyne Machinery Corp. (9699), Duro Dyne Corporation (3616), Duro Dyne West Corp. (5943), and Duro Dyne Midwest Corp. (4662).

Street, Trenton, New Jersey 08608, for entry of an order, substantially in the form submitted herewith, exempting asbestos claims and demands from the January 8, 2019 claims bar date.

**PLEASE TAKE FURTHER NOTICE** that the Debtors shall rely upon the Application in support of the Motion. No brief is necessary as no novel issues of fact or law are presented by the Motion. A proposed form of order is also submitted therewith. Oral argument is requested in the event an objection is timely filed.

**PLEASE TAKE FURTHER NOTICE** that any objections to the Motion must be filed with the Clerk of the Court together with proof of service thereof, and served so as to be **actually received** no later than **December 3, 2018 at 4:00 p.m. (ET)** by proposed counsel to the Debtors, Lowenstein Sandler LLP, One Lowenstein Drive, Roseland, New Jersey 07068, Attn.: Jeffrey D. Prol, Esq.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, must: (a) be in writing; (b) comply with the Bankruptcy Rules, the Local Rules, and other case management rules or orders of this Court; and (c) state with particularity the legal and factual basis for the objection.

**PLEASE TAKE FURTHER NOTICE** that unless an objection is timely filed and served in accordance with this notice, it may not be considered by the Bankruptcy Court. In the event no objections are filed, the relief requested in the Motion may be granted without a hearing.

*[Remainder of Page Intentionally Left Blank]*

Dated: November 16, 2018

Respectfully submitted,

**LOWENSTEIN SANDLER LLP**

/s/ Jeffrey D. Prol

Kenneth A. Rosen, Esq.  
Jeffrey D. Prol, Esq.  
One Lowenstein Drive  
Roseland, New Jersey 07068  
(973) 597-2500 (Telephone)  
(973) 597-2400 (Facsimile)  
[krosen@lowenstein.com](mailto:krosen@lowenstein.com)  
[jprol@lowenstein.com](mailto:jprol@lowenstein.com)

*Proposed Counsel to the Debtors and  
Debtors-in-Possession*